

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                  )  
  )  
v.    )         Criminal No. 04-10048-NG  
  )  
  )  
GIECLIFF RODRIGUEZ ET AL                  )

**JOINT STATUS REPORT**

Pursuant to Local Rule 116.5(A), the parties are hereby jointly filing the following status report prepared in connection with the initial status conference scheduled for April 8, 2004.

**1. Local Rule 116.3 Timing Requirements**

The parties are not presently requesting relief from the timing requirements of Local Rule 116.3.

**2. Expert Discovery**

The government anticipates that, unless there is a stipulation regarding the drugs involved in this case, it will offer expert testimony regarding the drugs at issue. One or more of the defendants expect to be requesting back up from the laboratory, and are reserving the right to seek such discovery (and to call their own experts) pending disclosure of trial witnesses by the government.

**3. Additional Discovery**

The government does not anticipate providing additional discovery other than additional certifications as they are received from the laboratory and expert disclosures as may be

requested as specified in paragraph 1, above. If additional discoverable reports relevant to this investigation are received, however, they will be produced.

4. Motion Date

The parties are jointly requesting that May 31, 2004 be set as the date for discovery motions to be filed and are requesting that the time between the April 1, 2004 and the date of the Final Status Conference be excluded from all Speedy Trial Act calculations.

5. Speedy Trial Act Calculations

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and agree that the following periods are excludable:

2/24/04-3/19/04	Government's motion for detention
3/4/04-4/1/04	Order for exclusion entered 3/4/04
4/1/04- Final Status	Excluded at the request of all parties in the interest of justice as set forth above.

As of the Final Status Conference, 0 days will have been counted and 70 days will remain under the Speedy Trial Act.

6. Anticipated Trial

The parties believe that it is too early to determine whether a trial in this matter will be required.

7. Final Status Conference

The parties request that a Final Status Conference be scheduled for June 7, 2004 or as soon thereafter as is convenient

for the court.

Respectfully submitted,

MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

By:

John A. WORTMANN, JR.  
PETER B. LEVITT  
Assistant U.S. Attorneys  
One Courthouse Way  
Boston, MA  
(617) 748-3207

Lois Lewis (JW)  
LOIS LEWIS  
4 Fuller Terrace  
West Newton, MA 02465  
617-969-4854

Attorney of Ricardo Rosario

Barry Pollack (JW)  
BARRY POLLACK  
One Beacon Street 33rd Floor  
Boston, MA 02108  
617-720-2880

Attorneys for Carmelo Rodriguez

Paul Garrity (JW)

PAUL J. GARRITY  
14 Londonderry Rd  
Londonderry, NH 03053  
603-434-4106  
Attorney for Jonathan Deleon

Robert Griffin (JW)  
ROBERT M. GRIFFIN  
30 Eastbrook Road  
Dedham, MA  
781-320-0099  
Attorney for Giecliff Rodriguez